

0018



United States Department of the Interior
Fish and Wildlife Service
Fish and Wildlife Enhancement
2060 Administration Building
1745 West 1700 South
Salt Lake City, Utah 84104-5110

org mine file
cc L Braxton
S Linner
ACT/015/032

IN REPLY REFER TO:

(FWE)

June 11, 1987

RECEIVED
JUN 12 1987

**DIVISION OF
OIL, GAS & MINING**

Dr. Dianne R. Nielson, Director
Utah Division of Oil, Gas, and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

ATTN: Lowell Braxton
Susan Linner

Dear Dr. Nielson:

We have reviewed the updated materials for the mid-term permit review of Genwal Coal Company's Crandall Canyon Mine, Tract II, and offer the following comments.

We disagree with the applicant's statement (Section 7.1.5, paragraph 1) that seeps and springs in the area of potential subsidence are an insignificant resource to local wildlife. Wildlife use of two springs is noted in the plan (Page 7-21, paragraph 2). Wildlife dependent on these limited water sources may have few alternative sources to use if water disappears from these springs. A plan to mitigate loss of water from these springs due to subsidence, such as construction of guzzlers, must be included in the mine plan.

Cliffs within the boundaries of the potential subsidence area should be surveyed for use by nesting raptors through the life of the mine. Any nests located should be monitored for subsidence effects.

The typographical error in Section 10.5 ("Since there are no critical periods...") should be corrected to state "Since there are critical periods..."

Thank you for this opportunity to comment.

Sincerely,

Robert G. Ruesink
Robert G. Ruesink
Acting State Supervisor



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